

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DALE A. GUILFOIL

Plaintiff,

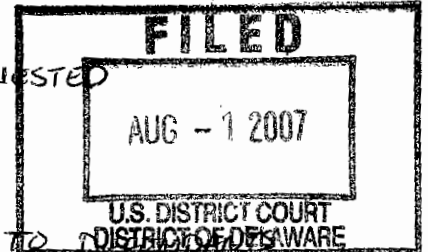
v.

DAVID PIERCE, et al.,

Defendants

C.A. No. 06-493-GMS

JURY TRIAL REQUESTED



PLAINTIFFS' FIRST SET OF INTERROGATORIES DIRECTED TO

Plaintiff hereby demand full and complete Answers to the following ^{BP} ~~scanned~~ Interrogatories under oath.

If you object to any of the Interrogatories herein, whether in whole or in part, on the ground that the information sought herein is privileged or Confidential, Answer to the extent possible, specifying your inability to answer and stating whatever information or knowledge you have concerning the unanswered portions.

These Interrogatories are continuing and require that Supplemental responses be filed in accordance with the Federal Rules of Civil Procedure.

INTERROGATORIES

1) Identify all documents which you intend to offer into evidence at trial in the defendants defense.

RESPONSE:

2). Identify all persons whom you intend to call as witnesses

at trial, excluding expert witnesses.

RESPONSE:

3) Identify each expert you expect to call to testify as a witnesses at trial and state for each such expert, (i) the qualifications of the expert, (ii) the subject matter on which the expert is expected to testify, (iii) the substance of the facts and opinions to which the expert is expected to testify and (iv) the summary of the grounds for such opinion.

RESPONSE:

4) Have anyone of the defendants, or anyone acting on their behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state:

a. The name and last known address of each such person; and

b. when, where, by whom and to whom each statement was made, and wheather it was reduced to writing or otherwise recorded.

RESPONSE:

5) Have any of the defendants or anyone acting on their behalf, given, or made any statement, declaration,

petition or affidavit concerning this action or its subject matter? If so state:

- a. The name and last known address of each such person; and
- b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE:

6) Identify all physicians you intend to call to trial to give testimony.

RESPONSE:

Dated: July 30 2007

Dale Guilfoil
Dale Guilfoil #166308
Pro Se,
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

VERIFICATION AS TO ANSWERS:

I hereby declare under penalty of perjury that the attached Defendants Responses to State Plaintiffs Interrogatories are true and correct.

Eileen Kelly (I.D. 2884)
Attorney for Defendants

CERTIFICATION OF SERVICE

I hereby certify that on July 30, 2007 I mailed by United States Postal Service, the foregoing motion to Eileen Kelly (E.D. 2884) Deputy Attorney General, Attorney for Defendants at 820 N. French Street, 6th Floor, Wilmington Delaware, 19801

Dale Guilford
Dale Guilford pro se
S.B.I. #166308
Sussex Correctional Institution
P.O. Box 500
Georgetown, DE 19947

Dated: July 30, 2007